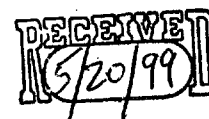


I N F I N I T Y²

I n c o r p o r a t e d

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May 13, 1999



Office of Special Nutritional (HFS-450)
Center for Food Safety and Applied Nutrition
Food & Drug Administration
200 "C" Street, SW
Washington, D.C. 20204

**RE: NOTIFICATION OF STATEMENTS ON
DIETARY SUPPLEMENT LABELS
PER DSHEA REGULATIONS**

Infinity², Inc. (address listed above), a U.S.-based distributor of nutritional supplements, is making the following nutritional support statements on its product labels:

Insure Plus

"If you're looking for a direct path to getting the nutrients your body needs to function at its best, choose Infinity²'s 100% natural whole food vitamin source, Insure Plus. At the heart of Infinity²'s Insure Plus is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Digest-A-Meal

Proper food digestion is the key to maximizing your energy levels and getting the most out of each meal. To replenish your body with vital enzymes and to support vitality and overall health, turn to Infinity²'s 100% natural Digest-A-Meal. At the heart of Infinity²'s Digest-A-Meal is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Lipo-Chromizyme

Instead of letting fats and sugars increase your pant size, why not make them work to increase your energy? With Infinity²'s Lipo-chromizyme fat-digesting formula, you can do just that. At the heart of Infinity²'s Lipo-chromizyme is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

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Corporate Headquarters

LET 3616

Life Force Super Antioxidant

Pollution, toxins and even stress can accelerate the formation of free radicals in the body, which have been linked to serious health risks. Protect yourself with Infinity²'s 100% natural Life Force Super Antioxidant. At the heart of Infinity²'s Life Force Super Antioxidant is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Total Flora Support

Every healthy immune system requires a sufficient amount of "friendly" bacteria. Strengthen your body's defenses and support your overall health with Infinity²'s Total Flora Support. At the heart of Infinity²'s Total Flora Support is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Cytolyse

The muscle and joint discomfort associated with an active lifestyle is hard to ignore. For relief, try Infinity²'s natural Cytolyse. At the heart of Infinity²'s Cytolyse is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Transportox

It isn't easy for the human body to filter the heavy metals and toxic chemicals it's exposed to on a daily basis. Give your body the extra help it needs to battle these toxins with Infinity²'s natural Transportox. At the heart of Transportox is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Total Body Flora

The cornerstones of longevity are a strong, healthy immune system and a digestive system that performs properly. Show your body that you value these two functions by reaching for Infinity²'s natural Total Body Flora. At the heart of Infinity²'s Total Body Flora is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Orthocol

A healthy liver promotes the effective utilization of fat and the disposal of toxins. Help your liver function at its best with Infinity²'s natural Orthocol. At the heart of Infinity²'s Orthocol is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Ferroflora

For some women and men, failure to maintain proper iron levels and the ill effects it brings—fatigue and low stamina—are all too common. To replenish your body's supply of this vital nutrient, choose Infinity²'s natural Ferroflora. At the heart of Infinity²'s Ferroflora is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Cell Balance

Monthly hormonal imbalances can bring a host of uncomfortable symptoms. For relief, turn to Infinity²'s natural Cell Balance. At the heart of Infinity²'s Cell Balance is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Vital Charge

In today's hectic world, stress is a normal part of daily life, but the negative effects don't have to be. Maintain focus and protect your health with Infinity²'s 100% natural Vital Charge. At the heart of Infinity²'s Vital Charge is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Ginkgo Biloba with CA^eDS

For sharper mental alertness and improved memory, turn to Infinity²'s 100% natural Ginkgo Biloba with CA^eDS. At the heart of Infinity²'s Ginkgo Biloba is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Garlic with CA^eDS

A sound heart and healthy cholesterol levels are the key ingredients to longevity. To maximize these functions, turn to Infinity²'s 100% natural Garlic with CA^eDS. At the heart of Infinity²'s Garlic is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

St. John's Wort with CA^eDS

When you need a hand in dealing with the emotional upset caused by disappointments and circumstances of life, turn to Infinity²'s 100% natural St. John Wort with CA^eDS. At the heart of Infinity²'s St. John's Wort is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Korean Ginseng with CA^eDS

For natural energy throughout the day, turn to Infinity²'s 100% natural Korean Ginseng with CA^eDS. At the heart of Infinity²'s Korean Ginseng is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Saw Palmetto with CA^eDS

For some men over 40, and most men over 50, prostate health is an issue that can't be ignored. To assist overall prostate health, turn to Infinity²'s 100% natural Saw Palmetto with CA^eDS. At the heart of Infinity²'s Saw Palmetto is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Kava Kava with CA^eDS

Everyday life can be hard to handle. To relieve nervous anxiety, reduce stress and promote restfulness in the body, turn to Infinity²'s 100% natural Kava Kava with CA^eDS. At the heart of Infinity²'s Kava Kava is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

Echinacea with CA^eDS

For those times when your body's natural defenses need strengthening, turn to Infinity²'s 100% natural Echinacea with CA^eDS. At the heart of Echinacea is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

ImmunePlus with Colostrum

A healthy immune system is the key to total health. Infinity²'s ImmunePlus is a revolutionary immune system enhancement formula that utilizes the unique "immune transfer factors" of Colostrum and other ingredients to provide a foundation for total immune system health. At the heart of Infinity²'s ImmunePlus with Colostrum is a proprietary Chelate Activated Enzyme Delivery System (CA^eDS) – a breakthrough formula that guarantees maximum effectiveness.

I certify that the information presented and contained in this notice regarding Infinity², Inc. dietary supplement labels is complete and accurate, and that these statements are truthful and not misleading.

Respectfully,

A handwritten signature in black ink, appearing to read "Stan Bynum", with a long horizontal flourish extending to the right.

Stan Bynum
Senior Director
Research and Development

SB/jm